

Comments Regarding FCC RM-11306

I am opposed to RM-11306 for the following reasons:

1: RM-11306 seeks to impose severe and unreasonable restrictions on the Amateur Service in general, and on how specific modes of operation are used, by creating a complex matrix of bandwidth-based regulations that affect existing modes, where no new regulations of these modes are needed. The Commission has already ruled on restricting bandwidth in the Amateur Service in the Commission's ruling on RM-10740. At that time the Commission stated: "We conclude that the petitioner's request for an amendment of our rules is inconsistent with the Commission's objective of encouraging the experimental aspects of the Amateur Radio Service."

2: RM-11306 points out that the Amateur Service is "fundamentally a technical service". Being a technical service, the proposed bandwidth restrictions have the potential to stifle the technical/experimental side of the Service and impose rules that more closely resemble the commercial broadcast service.

3: "Good amateur practice" is replaced with a series of restrictions. The average Amateur operator does not own the equipment to assure compliance with the proposed rule changes if a question arises about his/her transmitted bandwidth. This may put an increased burden on the Commission in the area of enforcement as disputes arise.

4: The proposal goes well beyond what is needed to foster growth of HF digital modes. The Commission's rules regarding the Amateur frequency allocations have long been "over-laid" by a band plan. These band plans could be modified to cause the least amount of disruption to the majority of the Amateur Service and allow an area for experimentation with digital modes as allowed by the Commission's rules. This would keep a separation between digital and voice modes thus reducing possible interference from semi-automatic and automatic digital stations. At most, the Petitioner's would need to ask the Commission for an easing of the rules as pertain to digital transmissions and not impose increased restrictions on the majority of the Amateur Service.

In summary, I feel that RM-11306 is unnecessary and unwarranted. It seeks to overturn a previous Commission decision under the guise of promoting digital HF modes and has the potential to stifle experimentation.

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